

**REMARKS**

At the outset, Applicant thanks the Examiner for the thorough review and consideration of the subject application. The Final Office Action dated September 10, 2003, has been received and its contents carefully noted.

Claims 1-20 are currently pending in the application. By this amendment, claims 1-4, 6-11, and 14-16 are amended for the Examiner's consideration. Claims 19-20 are newly added. Support for the amendments is provided in at least the originally filed claims, Figures 1-3, and related text of the specification. No new matter is added. Reconsideration of the rejected claims in view of the above amendments and the following remarks is respectfully requested.

***Rejections Under 35 U.S.C. §103***

Claims 1-18 were rejected under 35 U.S.C. §103(a) for allegedly being unpatentable over U.S. Patent No. 6,229,513 issued to Nakano, *et al.* ("Nakano") in view of U.S. Patent No. 6,356,260 issued to Montalbo. These rejections are respectfully traversed.

In levying an obviousness rejection under 35 U.S.C. § 103, the Examiner has the burden of establishing: (1) that the prior art references, when combined, teach or suggest all the claim limitations, (2) some suggestion or motivation to modify the reference or to combine reference teachings, and (3) a reasonable expectation of success. *See MPEP § 2143 (8<sup>th</sup> Ed., Rev. Feb. 2003).*

Claim 1 is allowable over the applied references in that claim 1 recites a combination of elements including, for example, "a first connecting member having a data driver that converts the RSDS specification into TTL data for generating a column signal when the image data, the

control signal, and the gray scale voltage are applied.” None of the applied references either singly or in combination teaches or suggests at least these features. Accordingly, Applicants respectfully submit that claim 1 and claims 2-5, which depend from claim 1 are allowable.

Claim 6 is allowable over the applied references in that claim 6 recites a combination of elements including, for example, “a first connecting member having a data driver for generating a column signal from the image data, the control signal, and the gray scale voltage, wherein the data driver comprises a decoder to decode the encoded digital data and the encoded digital control signal into TTL data.” None of the applied references either singly or in combination teaches or suggests at least these features. Accordingly, Applicants respectfully submit that claim 6 and claims 7-10, which depend from claim 6 are allowable.

Claim 11 is allowable over the applied references in that claim 11 recites a combination of elements including, for example, “a control board including a gray scale generating part, a gate voltage generation part, power supply part and connected to the flat panel display with a plurality of connecting members, wherein the plurality of connecting members include a plurality of column driver integrated circuits for receiving RSDS signals from the encoder and decoding the RSDS signals into a TTL signal.” None of the applied references either singly or in combination teaches or suggests at least these features. Accordingly, Applicants respectfully submit that claim 11 and claims 12-18, which depend from claim 11 are allowable.

For at least the foregoing reasons the applied prior art references, when combined, do not teach or suggest all of the claim limitations. Additionally, the Examiner has failed to provide the proper requisite motivation to combine Nakano with Montalbo.

Rather, it appears that the Examiner is picking and choosing parts of Montalbo to satisfy the requisite elements in the claim invention, and then assembling these parts with Nakano without the requisite motivation. This clearly amounts to using hindsight reconstruction with the present invention's specification as a blueprint. This is improper, as the only motivation would be impermissible hindsight.

*Added Claims*

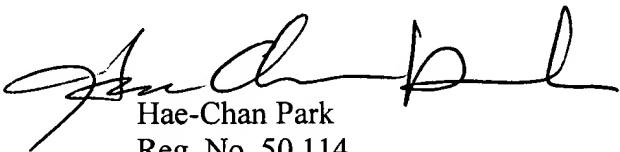
Newly added claims 18-20 are directed to features of the invention, which are not disclosed or suggested in the art of record. Accordingly, Applicant respectfully submits that claims 1-20 are in condition for allowance.

**CONCLUSION**

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete response has been made to the outstanding Office Action and, as such, claims 1-20 are in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment is respectfully requested.

Respectfully submitted,



Hae-Chan Park  
Reg. No. 50,114

Date: March 10, 2004

**McGuireWoods LLP**  
1750 Tysons Boulevard  
Suite 1800  
McLean, VA 22102-4215  
Tel: 703-712-5365  
Fax: 703-712-5280  
HCP/SJH/jmp